

REMARKS

Claims 1 and 4 – 21 are pending in the present application.

Claims 1, 4 – 7 and 12 – 14 are Patentable Over *Codos*

Claims 1, 4 – 7 and 12 – 14 were rejected under 35 U.S.C. § 102(a) as being anticipated by U.S. Patent No. 6,467,898 (*Codos*). The Examiner asserts that Figures 2 – 40 of *Codos* teach a printing machine having a housing comprising a conveyor table on which the substrate web is supported of printing, ink jet print head that print UV ink, UV light heads and a series of take-up rollers. The Examiner further asserts that the UV light heads are attached to the take-up rollers. The inventive claims relate to a UV curing module in which for use with a label rewinder. The UV light heads in *Codos* are located "on each side of the carriage to expose the ink immediately after it is deposited onto the substrate by the print heads" or the UV light heads are provided on a separate carriage" that is located next to but move independently of the movement of the print head carriage. See, *Codos* at Col. 14, lines 29 – 44. *Codos* does not teach or suggest a UV curing module with all the limitations of independent claim 1 or of claims 4 – 7 and 12 – 14. FThe UV light heads are separated from the take-up rollers by conveyor table 615 and heater 660. Because *Codos* does not teach or suggest a UV curing module attached to a label re-winder. Applicant respectfully asserts that Claims 1, 4 – 7 and 12 – 14 are patentable over *Codos*.

Claims 11 is Patentable over *Codos* in View of *Lincoln*

Claim 11 was rejected under 35 U.S.C. § 103(a) as being unpatentable over *Codos* in view of US Patent No. 5,935,525 (*Lincoln*). The Examiner acknowledges that *Codos* does not teach or suggest a UV curing module with all the limitations of Claim 11 including a reflector. The Examiner asserts that it would have been obvious to install the reflector of *Lincoln* into the printer of *Codos*.

Codos does not teach or suggest a UV curing module with all the limitations of Claim 11. Claim 11 depends indirectly from Claim 1 and thus has all the limitations of Claim 1. As discussed above, *Codos* does not teach or suggest a UV curing module attached to a label re-winder. *Lincoln* does not make up these deficiencies in *Codos*. Thus, Claim 11 is patentable.

Further, one skilled in the art would not combine *Codos* and *Lincoln*. There must be some teaching, suggestion or motivation to combine the cited references. *Lincoln* relates to an air treatment system that reduces and destroys volatile organic compounds, NO_x and CO in an exhaust air stream. There is no such teaching, suggestion or motivation to combine an air treatment system with a printer. Thus, one

skilled in the art would not combine *Codos* and *Lincoln*. Thus, Claim 11 is patentable over the cited art.

Claims 8 – 11 and 15 – 21 are patentable Over *Codos* in View of *Ylitalo*

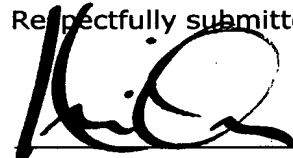
Claims 8 – 11 and 15 – 21 were rejected under 35 U.S.C. § 103(a) as being unpatentable over *Codos* in view of US Patent No. 6,543,890 (*Ylitalo*). *Ylitalo* is not prior art. *Ylitalo* was filed on 19 December 2001. The present application claims the benefit of US Provisional Application No. 60/283,113 filed 11 April 2001 and US Provisional Application No. 60/287,842 filed 1 May 2001. Accordingly, Applicant respectfully asserts that the Examiner should not have relied upon *Ylitalo* and that Claims 8 – 11 and 15 – 21 are patentable over the cited art.

Further, *Codos* does not teach or suggest a UV curing module with all the limitations of Claims 8 - 11. and 15 – 21. For example as discussed above, *Codos* does not teach or suggest a UV curing module attached to a label re-winder. By way of a further example, *Codos* does not teach or suggest a UV curing module with at least one filter. Because *Ylitalo* is not prior art it does not make up any deficiencies in *Codos*. Thus, Claims 8 – 11 and 15 – 21 are patentable over the cited art.

CONCLUSION

Applicant asserts that all of the objections have been overcome, and now requests further consideration on the merits.

Respectfully submitted,



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Elizabeth McAleese